

REBUTTAL TESTIMONY

OF

GEORGE LIGHT

ENGINEERING DEPARTMENT

TELECOMMUNICATIONS DIVISION

ILLINOIS COMMERCE COMMISSION

ICC ON ITS OWN MOTION

INVESTIGATION CONCERNING ILLINOIS BELL TELEPHONE COMPANY'S

COMPLIANCE WITH SECTION 271 OF THE TELECOMMUNICATIONS ACT

OF 1996

DOCKET NO. 01-0662 (PHASE 1)

APRIL 22, 2002

1 **Q.** Please state your name and business address.

2

3 **A.** My name is George Light. My business address is 160 North LaSalle Street,
4 Suite C-800, Chicago, Illinois 60601.

5

6 **Q.** Have you previously filed testimony in this proceeding?

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8 **A.** Yes. I submitted Direct Testimony in this proceeding on March 20, 2002.

9

10 **Q.** What is the purpose of your testimony?

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12 **A.** The purpose of my testimony is to provide my assessment of the direct testimony
13 of CLEC witness Edward J. Caputo on behalf of WorldCom, Inc. as it pertains to
14 Ameritech Illinois' (AI) compliance with Checklist Item 7, Operator
15 Services/Directory Assistance (OS/DA)¹. In addition, I will respond to the
16 testimony offered by XO witness Tara McCabe, who discusses Checklist Items 7
17 and 8, White Pages directory listings.²

18

19 **Checklist Item 7 - Operator Services and Directory Assistance**

20

21 **Q.** Have you read Mr. Caputo's testimony?

22

¹ WorldCom Exhibit 5.0.

² Direct Testimony of Tara McCabe, on behalf of XO Illinois, Inc., hereafter referred to as McCabe Direct.

23 A. Yes, I have.

24

25 Q. Please comment on Mr. Caputo's testimony.

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27 A. In his testimony, Mr. Caputo maintains that AI fails to meet its obligation to
28 provide customized routing that would enable WorldCom to route its local UNE-P
29 customers to WorldCom's own OS/DA platform. He further contends that AI's
30 offering of customized routing to a 3rd party OS/DA platform via the use of the
31 Advanced Intelligence Network ("AIN") is unproven to be suitable for WorldCom's
32 requirements.³

33

34 Q. What is WorldCom's proposal for customized OS/DA routing?

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36 A. WorldCom's proposal calls for the use of a unique Line Class Code or codes for
37 their CLEC customers that would route OS/DA calls over WorldCom's existing
38 trunks that carry their IXC (inter-exchange, or long distance) calls.

39

40 Q. Please define the meaning of "Line Class Code".

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42 A. Line Class Codes are designations within each customer's record in a switch.
43 Collectively, they define the various attributes of a customer's telephone service.
44 For example, one Line Class Code would identify a customer's class of service

³ WorldCom Exhibit 5.0 at 8-9.

(i.e., residential or business, flat or measured). Another line class code might define a customer's calling feature or features (i.e., call waiting, call forwarding, etc.)

Q. In what way would Line Class Codes serve to route WorldCom's OS/DA traffic?

A. If a WorldCom local service customer dialed "411" for directory assistance in his or her home area code, the Line Class Code would cause those 3 digits to be translated into a format that would be "understood" by WorldCom's existing Feature Group D ("FGD") trunks so that the call could be routed to a WorldCom operator⁴. For example, if a WorldCom customer in downtown Chicago dialed "411", the Line Class Code would translate it to "312-555-4334", WorldCom's customer information number, and route it accordingly.

Q. How does this differ from Ameritech's proposed customized routing?

A. AI's proposal utilizes the AIN to store translation and routing information for the WorldCom local customers' OS/DA calls. Unlike Line Class Codes, which are data that reside within the local switch, AIN data is customarily stored in a centralized database, in a location other than a local switch. When a WorldCom local service customer dials "411", there would be a query or "dip" from the local

⁴ Feature Group "D" trunks are connections between a LEC switch and an IXC's network, which allow IXC customers "equal access" (dialing "1+" or "0+") to their pre-selected long distance carriers. They also allow a customer to select an alternate IXC by dialing "1010XXX".

switch to the AIN to retrieve the information relevant to any special routing requirements prior to completing the call.

Q. Do both of these scenarios achieve the same end result?

A. It would appear that while the locations where the data is stored and the means by which the data is obtained are different, both methods would result in the same outcome.

Q. Are there efficiency or cost considerations that would make one customized routing method favorable over another?

A. Neither AI nor WorldCom have presented evidence that addresses the relative efficiency or costs of either form of customized routing.

Q. Is WorldCom's proposal for customized routing of OS/DA traffic technically feasible?

A. Mr. Caputo's testimony included multiple attachments containing the results of WorldCom's internal testing made in December of 2000, as well as documentation from various switch vendors (Siemen's, Lucent Technologies, etc.), which appear to support the technical feasibility of the CLEC's proposal. However, in March of 2001, Mr. Caputo offered testimony during an arbitration hearing before the California Public Utilities Commission ("CPUC") between

Pacific Bell and MCI (WorldCom) indicating there were problems with routing Operator Services traffic through Nortel switches using WorldCom's suggested method.⁵ Mr. Caputo stated in his California testimony that in instances of "0+" or "0-" dialing, the WorldCom customized routing "may not meet both MCI's (WorldCom) needs and at the same time Pacific's needs in order to allow that traffic to be routed so that it doesn't affect each other's traffic".⁶ This information is relevant, since approximately 45% of AI's network is comprised of Nortel switching equipment.

Q. Is AI's proposed AIN-based customized routing proposal technically feasible?

A. Mr. Caputo indicated in his testimony that AIN-based customized routing has not been tested by AI, contrary to the ICC's requirements and WorldCom's requests.⁷ AI witness Deere's testimony indicated that AI offers this capability. However, he does not directly indicate whether it has been tested.

Q. How did you assess AI's compliance with Checklist Item 7 in your previously filed testimony?

A. In my direct testimony, I stated that, based on the information available to me at the time my testimony was prepared, AI appeared to be in compliance with the non-rate requirements related to OS/DA under Checklist Item 7. I further noted

⁵ California Public Utilities Commission, Application 01-01-010 "Application of Pacific Bell for arbitration of an interconnection agreement with MCI Metro" p. 861-866, March 26, 2001. See, attached Schedule 17.01.

⁶ Id. at 861.

that my assessment of its compliance was subject to review of AI's performance measurement data, as well as the evidence presented by all parties to this case.

Q. Does any of the information you discuss above cause you to modify your assertion that AI meets the non-rate OS/DA requirements of this Checklist Item?

A. No, it does not. The information presented in the parties' testimony is unclear, and at times contradictory. It is not possible to ascertain from the information available whether a request has ever been directly made by WorldCom to AI to develop or implement its proposal for customized routing. Nor am I able to discern whether AI's proposed AIN-based method is a technically feasible alternative. While WorldCom supplies testing data that would suggest that its method could be successfully deployed, in testimony given a few months later, Mr. Caputo appears to acknowledge that problems exist in applying the proposed method in Nortel switching equipment.

Staff will reserve comment at this time, in anticipation that AI will respond to WorldCom's testimony on the issues, which will hopefully provide Staff with a better understanding of the issue raised by Mr. Caputo.

Checklist Items 7 – OS/DA and 8 - White Pages Listings

⁷ WorldCom Exhibit 5.0 at 9.

132 **Q.** Have you read the direct testimony presented by Tara McCabe on behalf of XO
133 Illinois?⁸
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135 **A.** Yes, I have.
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137 **Q.** What are the issues raised in Ms. McCabe's testimony?
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139 **A.** Ms. McCabe contends that due to various problems which XO has encountered
140 in the submission, tracking, verification and correction of white pages listings, AI
141 fails to meet its obligations under Checklist Items 7 and 8.
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143 **Q.** What is the basis for Ms. McCabe's assertion?
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145 **A.** Ms. McCabe speaks to problems encountered by XO when trying to place,
146 correct and verify its new customers' white pages and directory assistance
147 listings through AI's various computer systems and interfaces. She describes
148 occurrences where XO is unable to decipher whether a white pages listing has
149 been accepted and been communicated to AI's DA database. She further
150 contends that the means that a CLEC must employ to conduct verification is
151 cumbersome, and the time interval to correct errors is excessive.
152

153 **Q.** How do you respond to Ms. McCabe's testimony?

⁸ McCabe Direct.

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155 A. Ms. McCabe raises a concern that there may indeed be problems in AI's
156 compliance with Checklist Items 7 and 8. Specifically, her testimony, if
157 substantiated, could establish that AI is not meeting its responsibility that it
158 "provide(s) white pages listings for competitors' customers with the same
159 accuracy and reliability that it provides its own customers"⁹.

160

161 Q. Does Ms. McCabe's testimony alter your position in your direct testimony that AI
162 is meeting the requirements of Checklist Items 7 and 8?

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164 A. Staff does not presently have sufficient information to make an accurate
165 assessment of those problems. Further, while Ms. McCabe cites examples of
166 problems, her testimony does not quantify them, nor does it give Staff a clear
167 understanding of the scope or frequency of their occurrence.

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169 Staff will reserve comment at this time, in anticipation that AI will respond to XO's
170 testimony on this issue, which will provide Staff with a better understanding of the
171 issues raised by Ms. McCabe.

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173 Q. Does this conclude your testimony?

174

175 A. Yes, it does.

⁹ Second BellSouth Louisiana Order, 20747-48, para. 253.